

DRINKER BIDDLE & SHANLEY LLP  
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Attorneys for Defendants  
Johnson & Johnson, Janssen Pharmaceutica Inc.  
and Janssen Pharmaceutica Research Foundation

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**IN RE: PROPULSID® LITIGATION**

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION – MIDDLESEX COUNTY  
:  
: CIVIL ACTION  
:  
: **Case Code 247**  
:  
: **ORDER APPLICABLE TO ALL CASES**  
: **CONCERNING DOCUMENT**  
: **PRODUCTION AND DEPOSITIONS**  
:  
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THIS MATTER having been opened to the court by Drinker Biddle & Shanley LLP, attorneys for defendants, Johnson & Johnson, Janssen Pharmaceutica Inc. and Janssen Pharmaceutica Research Foundation on short notice with consent of Plaintiffs' Liaison Counsel and permission of the Court, for an order granting a protective order pursuant to R. 4:10-3, quashing plaintiffs' deposition notices, and the Court having considered the moving papers and papers in opposition thereto, and having heard argument of counsel and for good cause shown;

IT IS on this \_\_\_\_ day of December, 2000;

ORDERED:

1. Defendants' motion for a protective order, pursuant to R. 4:10-3, quashing the following deposition notices be and is hereby denied as to: (a) Notice to Take Videotaped Oral Deposition of Janssen Pharmaceutica Inc. Records Management Designated Representative dated

October 30, 2000; (b) Notice to Take Videotaped Oral Deposition of Janssen Pharmaceutica Inc. Safety Department Information Management Designated Representative(s) dated October 30, 2000; and (c) Notice to Take Videotaped Oral Deposition of Janssen Pharmaceutica Inc. MIS/IT Designated Representative(s).

2. Defendant shall respond to the document requests in these deposition notices by January 15, 2001.

3. The depositions described in paragraph 1 above shall go forward in the offices of defense counsel in New Jersey beginning on January 23, 2001.

4. Plaintiffs shall have a maximum of two days to complete the depositions in each of the three notices.

5. A maximum of ten people for plaintiffs and four people for defendants may be present, including counsel for parties in cases in which the depositions have been cross-noticed.

6. The depositions are limited to the subjects contained in the notices.

7. Only documents produced by defendants in response to the notices maybe used to question the deponents.

8. The New Jersey Court Rules shall govern the depositions.

9. Defendants' motion to quash the Notice to Take Videotaped Oral Deposition of Janssen Pharmaceutica Inc. Representative regarding Activities Relating to the Sales and Marketing of Propulsid in the State of New Jersey dated November 9, 2000, shall be held in abeyance, and the depositions shall not go forward at this time.

10. The next liaison counsel conference shall be held on January 19, 2001, at 1:45

p.m.

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Rosemary K. Reavey, J.S.C.  
for Honorable Marina Corodemus, J.S.C.

THIS MOTION WAS:

\_\_\_\_\_ Unopposed

\_\_\_\_\_ Opposed